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August 19, 2013

File Number 3330300

Mr. Mark Slovick  
Department of Planning and Land Use  
5201 Ruffin Road, Suite B  
San Diego, California 92123

Dear Mr. Slovick:

**SUBJECT:** San Diego Association of Governments Comments on Lilac Hills Ranch Master Planned Community Specific Plan, Draft Environmental Impact Report, and General Plan Amendment

Thank you for the opportunity to comment on Lilac Hills Ranch project. The San Diego Association of Governments (SANDAG) previously provided a Comment Letter dated July 27, 2012, on the Notice of Preparation for this project.

Our comments are based on policies included in the Regional Comprehensive Plan (RCP), the 2050 Regional Transportation Plan (2050 RTP) and its Sustainable Communities Strategy (SCS) and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth and sustainable development principles. The goal of these regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The 2050 RTP and SCS sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the project consider the needs of motorists, transit riders, pedestrians, and bicyclists and the implementation of a robust Transportation Demand Management (TDM) Program.

SANDAG has the following comments regarding the Lilac Hills Ranch Master Planned Community Draft Environmental Impact Report, Master Planned Community Specific Plan, and General Plan Amendment.

1. Although the County of San Diego has identified a number of smart growth areas (mostly Rural Villages with an average density of 10.9 du/ac) in the unincorporated area, this project is not identified on the Smart Growth Concept Map as a Smart Growth Opportunity Area. The County should evaluate this project and find it consistent with the goals and principles in its general plan (which SANDAG supported) and the 2050 Regional Transportation Plan and Sustainable Communities Strategy (2050 RTP/SCS and in the RCP. The density proposed in this

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project was not included in the 2050 Regional Growth Forecast associated with the 2050 RTP/SCS. The 2050 Regional Growth Forecast included the land use inputs that are consistent with the adopted County General Plan.

2. The project should address how it will connect to the regional transit network and nearby communities. Since the development includes senior housing and assisted living, it will be important to ensure that these residents (many of whom may not have access to vehicles) will have access to transit. Please coordinate with North County Transit District regarding existing and planned transit service.
3. Transportation and Traffic: The project should indicate how cumulative impacts to local roads and freeway facilities will be addressed. Due to the size of this project, please consider developing a TDM plan. Although efforts have been made to create a pedestrian friendly and mixed-use environment that reduces the need for auto travel within the development, motorized travel will still be heavily relied upon to reach other destinations beyond village boundaries. Also, the commercial uses are not proposed until Phase 2 of the development requiring residents to go off-site for all services with no options other than auto travel. TDM measures to consider for the development include:
  - o Subsidized transit passes for tenants
  - o Shuttle service to commercial areas and to the Escondido transit center
  - o Promotion of iCommute services (Ridematching, Vanpool Program, Guaranteed Road Home, SchoolPool, etc.) for tenants.

Please note that the 2050 RTP/SCS does not include investments in transit to serve this community. The SANDAG iCommute program can provide input on the development and implementation of a TDM plan that can assist future residents and employees with reducing both commute and non-commute single occupancy vehicle trips.

Although bicycle and pedestrian facilities have been included, bicycle parking and other supportive amenities have not been addressed.

The number of parking spaces available suggests that the development will be auto-oriented. Please consider parking strategies that can reduce auto travel demand. Please refer to the SANDAG publication *Parking Strategies for Smart Growth*.

### **Lilac Hills Traffic Impact Study**

Section 1, Figure 1-2: The project location is not within a designated Smart Growth Area and needs to strongly consider alternatives to vehicular travel; otherwise the project will significantly impact the transportation network. Please coordinate efforts with North County Transit District and Metropolitan Transit System regarding potential transit/shuttle services. The Route 610 peak period service is phased for the year 2018 within the 2050 RTP, coordination with this service should be considered.

Section 2.0 Analysis Methodology, Page 7: The San Diego region opted out of the California state Congestion Management Program in October 2009. Please refer to Technical Appendix 20 of the 2050 RTP which provides the federal Congestion Management Process; and please refer to the Regional Transportation Multimodal Analysis and update all components of the TIS accordingly.

The study states that no ramp metering analysis is justified. Please provide justification. Please also provide the timing of the five phases of development.

Please coordinate all intersection and facility impacts to State Route 76 and Interstate 15 with Caltrans District 11, including fair share contributions.

Again, we appreciate the opportunity to comment on Lilac Hills Ranch Master Planned Community Specific Plan and Traffic Impact Study. We also encourage the County of San Diego, where appropriate, to consider the following tools in evaluating this update based on the following SANDAG publications, which can be found on our Web site at [www.sandag.org/igr](http://www.sandag.org/igr).

- (1) *Designing for Smart Growth, Creating Great Places in the San Diego Region*
- (2) *Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region*
- (3) *Trip Generation for Smart Growth*
- (4) *Parking Strategies for Smart Growth*
- (5) *Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in EIRs*
- (6) *Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities*
- (7) *Riding to 2050, the San Diego Regional Bike Plan*

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or [susan.baldwin@sandag.org](mailto:susan.baldwin@sandag.org).

Sincerely,



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Senior Regional Planner

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